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## UNITED STATED BANKRUPTCY COURT WESTERN DISTRICT OF PENNSYLVANIA

In re:

BONNIE J. PARKER CASE NO. 18-10360-TPA

CHAPTER 13

Debtor

Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as trustee

of GCAT 2019-RPL-1 Trust

RELATED TO CLAIM NO. 5-2

Movant

:

BONNIE J. PARKER

RONDA J. WINNECOUR, Esq. Trustee

Respondents

## **DECLARATION RE:** CHAPTER 13 PLAN PAYMENT

Your Debtor, BONNIE J. PARKER, by and through her counsel, Jeffrey G. Herman, Esquire, files the within Declaration regarding the Chapter 13 Plan payment averring in support thereof as follows:

- 1. A Notice of Mortgage Payment Change was filed by the Movant on January 29, 2021.
- 2. The Notice of Mortgage Payment Change includes an updated Escrow Analysis which calls for a lower monthly tax escrow, from \$235.99 per month down to \$185.11 per month.
  - 2. The Plan remains adequately funded to pay the modified post-petition monthly payment.
- 3. The current monthly payment that the plan provides the trustee to pay to GCAT Asset Trust 2019-RPL1 is \$592.25.
  - The existing Chapter 13 Plan is sufficient to fund the Plan with the modified debt. 4.

Respectfully Submitted,

DATED: February 23, 2021 S/ Jeffrey G. Herman

Jeffrey G. Herman, Esq. PA LIC #82001 HERMAN & HERMAN, LLC

114 High Street P.O. Box 455

Waterford, PA 16441

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